

# EXHIBIT B



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April 12, 2017

**VIA ECF**

Hon. Allison D. Burroughs  
 U.S. District Court, District of Massachusetts  
 John Joseph Moakley U.S. Courthouse  
 1 Courthouse Way, Suite 2300  
 Boston, MA 02210

Re: *Students for Fair Admissions, Inc. v. President & Fellows of Harvard College*,  
 No. 1:14-cv-14176-ADB

Dear Judge Burroughs,

Plaintiff Students for Fair Admissions, Inc. ("SFFA") respectfully requests a conference to resolve discovery motions it has pending before the Court. Without prompt resolution of these discovery disputes, it will be impossible for the parties to meet the June 20, 2017 deadline for the close of fact discovery. Listed below are the matters currently pending before the Court:

Issue	Pending Since	Filings
SFFA's letter challenging Harvard's confidentiality designations	Nov. 1, 2016	<ul style="list-style-type: none"> <li>SFFA's letter describing disputed documents and parties' positions (11/1/16)</li> </ul>
SFFA's motion to compel production of reviewer comments	Feb. 3, 2017	<ul style="list-style-type: none"> <li>Parties ordered to submit proposals on reviewer comments (1/12/17)</li> <li>SFFA's and Harvard's letters (2/3/17)</li> </ul>
SFFA's motion to quash depositions of standing members	Apr. 5, 2017	<ul style="list-style-type: none"> <li>SFFA's motion to quash (3/15/17)</li> <li>Harvard's opposition (3/29/17)</li> <li>SFFA's reply (4/5/17)</li> </ul>
SFFA's motion to quash depositions of additional SFFA officers	Apr. 11, 2017	<ul style="list-style-type: none"> <li>SFFA's motion to quash (3/22/17)</li> <li>Harvard's opposition (4/5/17)</li> <li>SFFA's reply (4/11/17)</li> </ul>
SFFA's motion to compel production of unredacted documents	In progress	<ul style="list-style-type: none"> <li>SFFA's motion to compel (4/10/17)</li> <li>Briefing to be completed by 5/1/17</li> </ul>
SFFA's renewed motion to compel production of application files	In progress	<ul style="list-style-type: none"> <li>SFFA's motion to compel (4/10/17)</li> <li>Briefing to be completed by 5/1/17</li> </ul>
SFFA's request for additional depositions and custodians	In progress	<ul style="list-style-type: none"> <li>SFFA's letter motion (4/12/17)</li> <li>Briefing to be completed by 5/1/17</li> </ul>
Boston Latin High School's motion to quash third-party subpoena	In progress	<ul style="list-style-type: none"> <li>Boston Latin's motion (4/10/17)</li> <li>Briefing to be completed by 5/1/17</li> </ul>

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Most urgently, SFFA requests relief from Harvard's request to depose two of its officers and two of its student members. The first of those depositions is scheduled for May 9, 2017. Moreover, SFFA has recently submitted several motions to compel the production of various categories of discovery that are obviously important to this case. Finally, SFFA is unable to schedule several depositions until the Court rules on its motion to expand the number of deponents.

Accordingly, SFFA requests a conference to facilitate the prompt resolution of these pending matters once they have all been briefed. Counsel for SFFA is available for a conference on the following dates: May 1, May 2, May 3, May 5, or May 8. Counsel for SFFA also is amenable to a telephonic conference if it would be more convenient for the Court.

Respectfully submitted,

/s/ Patrick Strawbridge  
Patrick Strawbridge

cc: ECF recipients